

## DOCKET FILE COPY ORIGINAL

# Before the Federal Communications Commission Washington, D.C. 20554

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In the Matter of	) MM docket no. 00-15
Amendment of section 73.202 (b)	) RM-9804
Table of Allotments,	)
FM Broadcast Stations,	)
Channel 227A (93.3 mhz.)	)
Susquehanna, Pennsylvania	j

To: Chief, Allocations Branch Policy and Rules Division Mass Media Bureau

#### **REPLY**

Tammy M. Celenza (HEREAFTER PETITIONER), by her consultant, and pursuant to section 1.415 (C) of the Commission's rules (47 C.F.R. 1.415 (c)), hereby replies to the comments on the counterproposal to notice of proposed rule making, filed on March 20, 2000, of Montrose Broadcasting Corporation. In support thereof, Petitioner respectfully states as follows:

1. By notice of proposed Rule Making, DA 00-168 Released on February 4, 2000, the commission instituted rule making looking toward allotment of channel 227A at Susquehanna, Pennsylvania, as that community's first competitive local aural service. Interested parties were invited to file comments on or before March 20, 2000, replies on or before April 4, 2000.

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- 2. On March 07, 2000, Petitioner filed comments in support of her proposal. On March 20, 2000, the Montrose Broadcasting Corporation filed their comments on and Counterproposals to Notice Of Proposed Rule Making urging the Commission to Substitute Hallstead, Pennsylvania, for Susquehanna, as the channel 227A community Of license. The Montrose Broadcasting Corporation also filed supplement to "comments", dated March 21, 2000, which was served on consultant for petitioner by mail on March 24, 2000.
- 3. Petitioner will confine her reply to the assertions made by Montrose Broadcasting Corporation concerning the proposed allotment of channel 227A at Susquehanna.
  Petitioner reserves the right to respond to the Montrose Broadcasting Corporation
  Hallstead counterproposal for filing and invites interested parties to comment thereon.
- 4. In their March 20, 2000 comments the Montrose Broadcasting Corporation asserts that there coordinates at 41-55-30N 75-30-14W with an antenna height above the average terrain of 100 meters with 6.0 kw. Would serve the city of Hallstead with a complete city grade coverage of a 70 dBu contour, see our technical portions of Celenza reply comments it will show a point to point study showing that from the proposed coordinates of Montrose Broadcasting Corporation to the city of Hallstead, Pennsylvania distance is 20.28 km, at the bearing of 281.38. The distance between the proposed site and the city of Hallstead there is such terrain roughness that it would be impossible for this site or any site within a 4 square km. for a city grade coverage to be placed over the

city of Hallstead. Also the point to point study points out that there is such a difference in height above sea level in the proposed site and the proposed city of license of Hallstead.

- 4. The Commission should not consider the Montrose Broadcasting Corporation

  Technical argument stating that from there proposed coordinates they would be able to

  Cover the city of Hallstead with a city grade coverage with a 70 dBu contour.
- 5. As noted in petitioner's October 27, 1999, Petition For Rule Making, Susquehanna, is a community of substantial size (1990 population-1760) which is Presently served by a FM WKGB. The allotment of channel 227A would provide Susquehanna, Pennsylvania with its first competitive local aural service. The Commission should allot channel 227A to Susquehanna.

Respectfully Submitted,

Tammy M. Celenza

Michael S. Celenza

Celenza Communications

41 Kathleen Crescent

Coram, N.Y. 11727

(631) 928-6506

Dated March 24, 2000

TECHNICAL EXHIBIT
FM TABLE OF ALLOTMENTS
CHANNEL 227A, SUSQUEHANNA, PENNSYLVANIA
MM DOCKET NO. 00-15
RM-9804

PETITIONER: TAMMY M. CELENZA

#### NARRATIVE

The technical narrative was prepared on behalf of Tammy M. Celenza,
Petitioner, in support of her proposal to amend the FM Table Of Allotments (47CFR
73.202) To add fm channel 227A, as a fully spaced class A FM commercial service,
to serve the community of Susquehanna, Pennsylvania.

This office, as consultant to Tammy M. Celenza, has evaluated the March 20, 2000 comments of Montrose Broadcasting Corporation with regards to substitute the city of Hallstead, Pennsylvania for Susquehanna. We find it near impossible for the proposed site or any site within 4 square km. to cover the proposed city of license of Hallstead with a 70 dBu contour completely.

We provided a exhibit it is a point to point study which evaluates the terrain between the transmitter location and the proposed city of license, as you can see in the exhibit it shows there proposed site being at an elevation above means of sea level 422 meters plus a tower having to be 152 meters above ground level to achieve 100 meters height above the average terrain. Also you can see that the proposed city of Hallstead is located in such a low lying area that the terrain between the transmitter site and city is

extremely rough that it would be impossible for any field Strength, or city grade coverage to get into the city of Hallstead, Pennsylvania.

Further, I feel that the Commission should allot channel 227A to the city of Susquehanna, Pennsylvania. For one it's the only city in that local area which has a large enough population to be considered a city of license. Second Susquehanna would be covered by a 70 dBu contour from the coordinates that we proposed originally. Third of all a large enough area to locate an antenna 32 square kilometers instead of 4 which would only work for the proposal of Montrose Broadcasting Corporation.

Additional information, if required, concerning the technical merits or methods Employed in preparation of this technical narrative may be obtained by contacting the undersigned.

March 25, 2000

Michael S. Celenza

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Celenza Communications Consultant

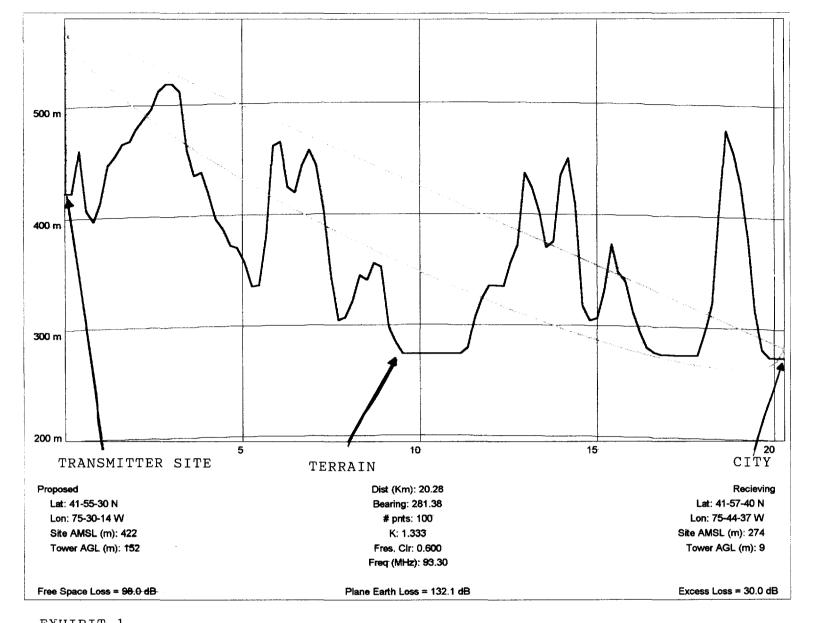


EXHIBIT 1
POINT TO POINT STUDY SHOWING THE PROPOSED SITE OF MONTROSE BROADCASTING CORPORATION. NOTICE THE TERRAIN ROUGHNEST BETWEEN TRANSMITTER SITE AND CITY AREA TO THE RIGHT. SIGNAL FOR FM CAN"T GO THROUGH MOUNTAINS... AND GET INTO VALLEY.

CELENZA COMMUNICATIONS CONSULTANT

### Certificate Of Service

I, Michael S. Celenza, a Communications Consultant at Celenza Communications

Consultant, do hereby certify that true copies of the foregoing "reply"were sent March

28, 2000, by first-class united states mail, postage prepaid, to the following:

Ms. Sharon P. McDonald Chief Allocations Branch Federal Communications Commission 445 12<sup>th</sup> Street, S.W., Room 3A-266 Washington, D.C. 20554

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Mclean, VA. 22102-3807

Michael S. Celenza